

State Water Resources Control Board

May 4, 2016

(Via email and Certified Mail)

CERTIFIED MAIL

NO. 7015 1520 0001 8019 6613

Mr. Collins Kalu
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
Los Angeles, California 90012
kaluc@metro.net

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT DIVISION 7, 8800 WEST SANTA MONICA BOULEVARD
WEST HOLLYWOOD**

Dear Mr. Kalu:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on April 25, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Site Map – The site map is insufficient; it does not include a scaled diagram which indicates the location of the underground storage tanks (including the tank, piping, and auxiliary equipment) with respect to buildings or other landmarks.	All	April 25, 2016	Ongoing	23 CCR 2711(a)(8)
2	Failure to Monitor Product Piping – The sensor in the fill/piping sump is unable to detect a leak at the earliest opportunity because it is on the wrong side of the sump.	23	April 25, 2016	Ongoing	23 CCR 2630(d)
3	Failure to Maintain Secondary Containment – Failures occurred during the September 9, 2015 secondary containment test and have not been repaired or retested.	12, 13, 16, 17, 19, 22, & 24.	September 9, 2015	Ongoing	H&SC 25291(a)(2)

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Install Line Leak Detectors – Pneumatic pumps have pressurized underground piping without line leak detectors.	17, 19, 22 & 23	April 25, 2016	Ongoing	23 CCR 2636(f)(2)
5	Failure to Install Secondary Containment – A portion of underground piping from the oil water separator to the piping sump is single-wall galvanized steel.	24	April 25, 2016	Ongoing	H&SC 25291(a)(2)
6	Failure to Maintain Tank Information Forms – The tank information page in CERS lists the tank overfill prevention mechanism as having a fill tube shut-off valve, however, no valve was observed at the time of inspection.	13	April 25, 2016	Ongoing	23 CCR 2711(a)
7	Failure to Tag Monitoring Equipment – The automatic tank gauge did not have an annual monitoring certification tag on it at the time of inspection.	13	April 25, 2016	Ongoing	23 CCR 2638(f)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles County Department of Public Works within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mr. Joseph Baiocco
Inspection Unit Supervisor
Los Angeles County Department
of Public Works
900 South Fremont Street
Alhambra, California 91803
jbaiocco@dpw.lacounty.gov

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amantha Henkel".

Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Tim Smith
Civil Engineer
Los Angeles County Department
of Public Works
tsmith@dpw.lacounty.gov

Mr. Luke Mitchell
Associate Civil Engineer
Los Angeles County Department
of Public Works
lmitchell@dpw.lacounty.gov

Mr. Joseph Baiocco
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Mr. James Jimenez
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Mr. Roger Uhden
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